

**Before the
Federal Communications Commission
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Amendment of the Commission's Rules)	WT Docket No. 07-250
Governing Hearing Aid-Compatible Mobile)	
Handsets)	

COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation ("Sprint") submits these comments in response to the request for comment sought by the Federal Communications Commission ("Commission") Wireless Telecommunications Bureau ("WTB") and Office of Engineering and Technology ("OET") (the "Bureaus" acting on delegated authority) on the Second Further Notice of Proposed Rulemaking ("Second FNPRM") regarding the adoption of the most current hearing aid compatibility standard into the Commission's rules.¹ The Commission's current rules reference the 2007 revision of American National Standards Institute (ANSI) technical standard C63.19 (the "2007 ANSI C.63.19") formulated by the Accredited Standards Committee C63® – Electromagnetic Compatibility ("ASC C63").² ASC C63 published a new version of the standard on May 27, 2011 ("2011 ANSI C63.19") and requested that the Commission formally adopt this new version.

Sprint supports adoption of the 2011 ANSI C63.19 standard. The new standard has been refined, improved, and, most importantly, it has been expanded to allow for the testing of new handset technologies and air interfaces. The Bureaus should, however, provide a two-year transition period. This

¹ See *Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets*, Second Further Notice of Proposed Rulemaking, 26 FCC Rcd 14991 (WTB/OET 2011).

² 47 C.F.R. § 20.19(b)(1)(ii).

is an appropriate and reasonable period of time as it will provide the necessary time for manufacturers and service providers to incorporate the new standard into product development cycles.

Furthermore, while the Bureaus have made clear that a handset launched during the transition period can be certified under 2007 ANSI C.63.19, the Bureaus should also make clear that these handsets (and handsets launched prior to the transition period) do not need to be recertified when the new 2011 ANSI C63.19 standard goes into effect. This approach is consistent with the way in which the Commission handled the transition to the 2007 standard.³ Similarly, Sprint urges the Bureau's to make clear that manufacturers and service providers may continue to count, as HAC compliant, handsets that have been certified under the 2007 standard and previous standards.

Respectfully submitted,

SPRINT NEXTEL CORPORATION

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³ See *Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets: Petition of American National Standards Institute Accredited Standards Committee C63 (EMC) ANSI ASC C63*, First Report and Order, 23 FCC Rcd 3406, 3439, ¶ 83.